

Ryan Q. Keech (SBN 280306)
Ryan.Keech@klgates.com
Stacey Chiu (SBN 321345)
Stacey.Chiu@klgates.com
Rebecca I. Makitalo (SBN 330258)
Rebecca.Makitalo@klgates.com
Jacob R. Winningham (SBN 357987)
Jacob.Winningham@klgates.com
K&L GATES LLP
10100 Santa Monica Boulevard
Eighth Floor
Los Angeles, California 90067
Telephone: +1 310 552 5000
Facsimile: +1 310 552 5001

*Attorneys for Defendant and Counterclaimant
CHECKMATE.COM INC.*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ARJUN VASAN,

Plaintiff,

v.

CHECKMATE.COM, INC.,

Defendant.

CHECKMATE.COM, INC.,

Counterclaim-Plaintiff,

v.

ARJUN VASAN,

Counterclaim-
Defendant.

Case No. 2:25-CV-00765-MEMF-AS

Magistrate Judge Alka Sagar

DISCOVERY MATTER

**JOINT STIPULATION TO POST-
PONE THE DEPOSITION OF
VASAN VARADARAJAN**

*[Filed concurrently herewith [Pro-
posed] Order]*

Complaint Filed: January 28, 2025
Amended Complaint Filed: February
21, 2025

JOINT STIPULATION TO POSTPONE THE DEPOSITION OF VASAN VARADARAJAN

1 Defendant and Counterclaimant Checkmate.com Inc. (“Checkmate” or
2 “Defendant”), non-party Vasana Varadarajan, and Plaintiff Arjun Vasana (“Plaintiff”
3 or “Vasana”), by and through, as applicable, their counsel of record, hereby stipulate
4 and agree as follows:

5 WHEREAS, on August 14, 2025, Mr. Varadarajan was personally served
6 with a subpoena to testify at a deposition and produce documents;

7 WHEREAS, the subpoena commanded Mr. Varadarajan to appear for
8 deposition and produce documents on September 22, 2025, at the offices of K&L
9 Gates, located in Los Angeles, California;

10 WHEREAS, on September 22, 2025, Mr. Varadarajan failed to appear for
11 deposition or produce documents;

12 WHEREAS, on October 14, 2025 Checkmate filed a Motion to Enforce and
13 Compel Compliance with Subpoena to Vasana Varadarajan and for Contempt
14 (“Motion to Compel”);

15 WHEREAS, on December 1, 2025, the Court granted in part Checkmate’s
16 Motion to Compel and ordered Mr. Varadarajan to appear for deposition on January
17 12, 2026 (Dkt. 131);

18 WHEREAS, Checkmate and Plaintiff Arjun Vasana (collectively, the
19 “Parties”) have engaged in settlement discussions that, in two (2) weeks, or on or
20 about January 23, 2026, may result in a notice of settlement in principle and
21 potential dismissal without prejudice of the above-captioned action;

22 WHEREAS, weighing the timing of the potential dismissal against the need
23 to proceed expeditiously with obtaining Mr. Varadarajan’s compliance, it is in the
24 interests of judicial economy and to conserve party and non-party resources to
25 postpone Mr. Varadarajan’s deposition;

26 WHEREAS, Mr. Varadarajan is available and has agreed to appear for his
27 deposition on January 26, 2026;

1 WHEREAS, in an abundance of caution in the event discussions break down
2 and a settlement is not reached, Checkmate and Mr. Varadarajan agree that the
3 deposition of Mr. Varadarajan shall be continued for two (2) weeks to January 26,
4 2026, to occur in person at the offices of K&L Gates in Los Angeles.

5 NOW THEREFORE, Checkmate and Mr. Varadarajan hereby stipulate and
6 request, by and through their respective counsel, the following:

7 That the Court's December 1, 2025 Order compelling Mr. Varadarajan to
8 appear for deposition in person at the offices of K&L Gates in Los Angeles on
9 January 12, 2026 (Dkt. 131 ("After hearing from the parties, the Court sets V.
10 Varadarajan's deposition for January 12, 2026.")), shall be modified so as to
11 postpone Mr. Varadarajan's obligation to appear for two (2) weeks, to **January 26,**
12 **2026**, and shall otherwise remain unmodified and in full force and effect.

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14 **SIGANTURES TO FOLLOW ON NEXT PAGE**
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2 Date: January 8, 2026

K&L GATES LLP



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Rebecca I. Makitalo (SBN 330258)
Jacob R. Winningham (SBN 357987)
10100 Santa Monica Boulevard, 8th Floor
Los Angeles, California 90067
Telephone: 310.552.5000
Facsimile: 310.552.5001

*Attorneys for Defendant and Counter-
Claimant CHECKMATE.COM INC.*

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12
13 Date: January 8, 2026

14
15 /s/ Arjun Vasan

16 Arjun Vasan, *Pro Se*

17
18 Date: January 8, 2026



19
20 Vasam Varadarajan, Pro Se

CERTIFICATE OF ATTESTATION

Pursuant to Civil L.R. 5-4.3.4(a)(2)(i), the filer attests that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

Date: January 8, 2026

K&L GATES LLP



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*Attorneys for Defendant and Counter-
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